

**From:** [Gavlas, Sean](#)  
**To:** [Moore, Gary](#)  
**Subject:** RE: F.J. Doyle - Building (Urgent)  
**Date:** Friday, September 28, 2018 8:01:20 AM

---

Good Morning Gary,

Is this a green light on wipe sampling next week or will it be addressed sometime prior to demolition/disposal?

***Sean Gavlas***

**Weston Solutions, Inc.**

Region 6 Superfund Technical Assessment and Response Team (START)  
2600 Dallas Parkway, Suite 280  
Frisco, TX 75034

Cell: 609-433-8434

Office: 469-666-5560

[sean.gavlas@westonsolutions.com](mailto:sean.gavlas@westonsolutions.com)

---

**From:** Evan Wortman [mailto:[e.wortman@erllc.com](mailto:e.wortman@erllc.com)]  
**Sent:** Thursday, September 27, 2018 3:45 PM  
**To:** Moore, Gary <[Moore.Gary@epa.gov](mailto:Moore.Gary@epa.gov)>  
**Cc:** Don Edgington <[d.edgington@erllc.com](mailto:d.edgington@erllc.com)>; Delgado, Paige <[Delgado.Paige@epa.gov](mailto:Delgado.Paige@epa.gov)>; Gavlas, Sean <[Sean.Gavlas@WestonSolutions.com](mailto:Sean.Gavlas@WestonSolutions.com)>  
**Subject:** RE: F.J. Doyle - Building (Urgent)

Hi Gary, historically we have not considered scarp metal a CERCLA waste and have utilized scarp yards in the past for recycling. We typically do some due diligence and confirm with state DEQ that the selected scrap has no violations or issues first. However, I think wipe sampling would be a good idea and we would need to decon the metal if the wipe samples came back above the 100 ug/100 cm<sup>2</sup>. Cost of sheet metal recycling is pretty low right now so would be cheaper to landfill than to decon and recycle.

The wood can just be mixed with soil instead of profiling separately as construction debris. We'll include a certain percentage of wood, PPE, visqueen, concrete, rock, etc in the soil profile for both the TSCA and non-TSCA waste streams so its all covered.

---

**From:** Moore, Gary <[Moore.Gary@epa.gov](mailto:Moore.Gary@epa.gov)>  
**Sent:** Thursday, September 27, 2018 1:18 PM  
**To:** Evan Wortman <[e.wortman@erllc.com](mailto:e.wortman@erllc.com)>  
**Cc:** Don Edgington <[d.edgington@erllc.com](mailto:d.edgington@erllc.com)>; Delgado, Paige <[Delgado.Paige@epa.gov](mailto:Delgado.Paige@epa.gov)>; 'Gavlas, Sean' <[Sean.Gavlas@WestonSolutions.com](mailto:Sean.Gavlas@WestonSolutions.com)>

**Subject:** F.J. Doyle - Building (Urgent)

Evan:

I talked with our TSCA PCB person, Jim Sales, about the building at it appears that it will not be easy to be able to recycle the metal associated with the building demo. First of all, we will probably not find a metal recycler that would be CERCLA approved. Secondly, it appears that we could dispose of the metal and wood at a non-TSCA landfill if the wipe samples of the metal are less than 100 ug/100 cm2 total PCBs and the wood is less than 50 mg/kg total PCBs. Otherwise, we can just send the material to a TSCA landfill that can accept construction debris but I am not sure what profile sample they would need.

I need you guys to determine the most cost effective way to do this. I guess the wipe samples and wood sample would be no different than our profile samples (a little different with the wipe). Please research this for me and confirm what we need to do exactly to dispose. Do you guys have someone that is well versed in the TSCA PCB regulations.

Thanks

**Gary W. Moore (6SF-ER)**  
**Federal On-Scene Coordinator**  
**U.S EPA Region 6**  
**1445 Ross Ave, Suite 1200**  
**Dallas, TX 75202-2733**  
**Cell: 214.789.1627**  
[moore.gary@epa.gov](mailto:moore.gary@epa.gov)

Confidentiality Warning: This e-mail and any attachments contain information intended only for the use of the individual or entity named above. If the reader of this e-mail is not the intended recipient or the employee or agent responsible for delivering it to the intended recipient, any dissemination, publication or copying of this e-mail is strictly prohibited. Although this email has been scanned for malware, the sender does not accept any responsibility for any loss, disruption or damage to your data or computer system that may occur while using data contained in, or transmitted with, this e-mail. If you have received this e-mail in error, please immediately notify by return e-mail. Thank you.

**WARNING: External Email: This email originated outside of Weston Solutions. DO NOT CLICK on any links or attachments unless you recognize the sender and are expecting the email.**

CONFIDENTIALITY: This email and attachments may contain information which is confidential and proprietary. Disclosure or use of any such confidential or proprietary information without the written permission of Weston Solutions, Inc. is strictly prohibited. If you received this email in error, please notify the sender by return e-mail and delete this email from your system. Thank you.